

Juan Chavez, OSB #136428  
Hannah Bland, OSB #252404  
Oregon Justice Resource Center  
PO Box 5248  
Portland, OR 97208  
Tel: 503-944-2270

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

PHILLIP SITBON,

Plaintiff,

v.

CITY OF PORTLAND, PORTLAND POLICE  
BUREAU OFFICER CRAIG LEHMAN, and  
JOHN DOES 1-10,

Defendants.

Case No. 3:22-cv-01148-SI

UNOPPOSED MOTION FOR EXTENSION OF  
TIME

**LR 7-1 CERTIFICATION**

Pursuant to Local Rule 7-1, Hannah Bland, counsel for Plaintiff Phillip Sitbon, hereby certifies that she conferred with Naomi Sheffield, counsel for the Defendant City of Portland, and with Karen O’Kasey, counsel for Defendant Craig Lehman, on July 18, 2025, and neither Defendant opposed this motion.

**RELIEF REQUESTED**

Plaintiff requests an additional 30 days to file his Notice of Appeal. The requested deadline would be August 22, 2025.

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PLAINTIFF’S UNOPPOSED MOTION FOR  
EXTENSION OF TIME

### **ARGUMENT AND AUTHORITY**

Case schedules can be modified and extended based upon a showing of “good cause.” Fed. R. Civ. P. 16(b)(4). Here, there is good cause for an extension of the Notice of Appeal deadline by 30 days. Plaintiff needs additional time to find appellate counsel and assess appealability of the case. This motion is not made for purposes of delay.

### **CONCLUSION**

Based on the foregoing, Plaintiff requests that this unopposed motion be granted, and that the new deadline of August 22, 2025 be set.

DATED: July 21, 2025.

/s/ Hannah Bland  
Hannah Bland, OSB No. 252404  
Oregon Justice Resource Center  
PO Box 5248  
Portland, OR 97208

Of Attorneys for Plaintiff